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5 Attorneys for Defendant  
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8 UNITED STATES DISTRICT COURT

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10 FOR THE

11 NORTHERN MARIANA ISLANDS

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 CRIMINAL CASE NO. 08-00019-001

15 vs.

16 GUIHUA LUO KING,

17 Defendant.

18 DECLARATION OF JOHN D. OSBORN  
19 IN SUPPORT OF MOTION TO  
20 SHORTEN TIME

21 I, John D. Osborn, declare:

22 1. I am a partner with Carlsmith Ball, attorneys for Guihua Luo King with regard to the  
above captioned matter. I am competent to testify to the matters set forth herein and make this  
Declaration based on my own personal knowledge and belief.

23 2. Order Setting Trial Date dated June 20, 2008 ordered that pretrial motions shall be filed  
no later than Monday, July 7, 2008.

24 3. Movant has yet to receive any discovery from the United States of America in order to  
properly determine whether any pretrial motions should be filed by July 7, 2008, including  
raising any mandatory affirmative defenses and/or suppressing certain evidence obtained in  
violations of Movant's constitutional rights.

4. Without said discovery, Movant will be unduly prejudiced due to her inability to adequately defend herself and establish of all available defenses and objections to evidence unknown to her.

5. Pursuant to Criminal Local Rule 12.1, Court upon motion and for good cause shown may extend the time for filing motions.

7. Counsel for Movant has caused to be delivered to the United States of America a copy of the Motion to Extend the Time for Filing Motions and a copy of the Motion to Shorten Time.

8. The United States of America does not object to Movant's Motion to Extend the Time for Filing Motions until July 21, 2008.

9. For the above reasons, counsel for Movant requests that the time for hearing on the Motion to Extend the Time for Filing Motions until July 21, 2008 be shortened as fits the Court's calendar.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this Declaration is executed on July 1, 2008 at Saipan, Commonwealth of the Northern Mariana Islands.

CARLSMITH BALL LLP

DATED: Saipan, MP, July / , 2008.

  
JOHN D. OSBORN  
Attorneys for Defendant  
GUIHUA LUO KING